

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LUCILLE TIRADO, as the Administratrix of the Estate of
EUGENE CASTILLE, Deceased,

Case No.:
1:19-CV-10377 (LAK/SN)

Plaintiff,

- against -

THE CITY OF NEW YORK; CORRECTION OFFICER
ANAI DACRUZ (#18067); CORRECTION OFFICER
WARD (#6080); CORRECTION OFFICER BROWN
(#12987); CORRECTION OFFICER SISTRUNCK (#
13421); CORRECTION OFFICER NUGENT (#18109);
CORRECTION OFFICER DANIELS (#17339);
CORRECTION OFFICER AZEEZ (#1443); CORRECTION
OFFICER ROGERS (#); CORRECTION OFFICER
GARAMEDE; CAPTAIN BATCHELOR (#461); CAPTAIN
PRINCE (#1609); CAPTAIN ELLIS (#511); and ALEXIS
QUENTZ,

**RULE 68 OFFER
OF JUDGMENT**

Defendants.
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Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendant The City of New York hereby offers to allow plaintiff Lucille Tirado, as the Administratrix of the Estate of Eugene Castille, Deceased, to take judgment against The City of New York in this action for the sum of **FIFTY THOUSAND DOLLARS (\$50,000.00)**, inclusive of attorneys' fees, expenses and costs accrued to the date of this offer.

This judgment shall be in full satisfaction of all claims or rights that plaintiff has or may have to damages, or any other form of relief, arising out of the alleged acts or omissions of the defendants, The City of New York, CORRECTION OFFICER ANAI DACRUZ (#18067); CORRECTION OFFICER WARD (#6080); CORRECTION OFFICER BROWN (#12987); CORRECTION OFFICER SISTRUNCK (# 13421); CORRECTION OFFICER NUGENT (#18109); CORRECTION OFFICER DANIELS (#17339); CORRECTION

OFFICER AZEEZ (#1443); CORRECTION OFFICER ROGERS (#); CORRECTION OFFICER GARAMEDE; CAPTAIN BATCHELOR (#461); CAPTAIN PRINCE (#1609); CAPTAIN ELLIS (#511); and ALEXIS QUENTZ, and any official, employee, representative and/or agent, either past or present, of The City of New York, or any agency or agent thereof, in connection with the facts and circumstances that are the subject of this action.

This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure, and is not to be construed as an admission of liability by any defendant, and any official, employee, representative and/or agent, either past or present, of the City of New York, or any agency or agent thereof; nor is it an admission that plaintiff has suffered any damages.

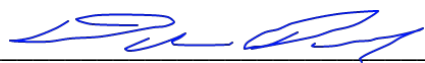
Acceptance of this offer of judgment will act to release and discharge all defendants, their successors or assigns, and all past and present officials, employees, representatives and/or agents, either past or present, of the City of New York, or any agency or agent thereof, from any and all claims that were or could have been alleged by plaintiff in the above-referenced action.

If plaintiff does not accept this offer within ten (10) business days after service of the offer upon them, this offer will be deemed rejected.

Dated: New York, New York
May 17, 2021

Respectfully submitted,

HEIDELL, PITTONI, MURPHY & BACH, LLP
Of Counsel to JAMES E. JOHNSON, Corporation
Counsel of the City Of New York



Darshan I. Patel (2212)

TO: **VIA ECF**

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